UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION, Plaintiff, v. **RAGINGBULL.COM, LLC**, et al., Defendants.	Case No. 1:20-cv-3538

PLAINTIFF'S NOTICE OF CANDIDATE FOR APPOINTMENT AS RECEIVER

Plaintiff Federal Trade Commission ("FTC") respectfully notifies the Court that it has identified a candidate available for appointment as receiver in the captioned case if the Court grants the FTC's request for the appointment of a receiver. The candidate is **Peter E. Keith**, of Gallagher, Evelius, and Jones in Baltimore, Maryland.

Mr. Keith has extensive experience with federal and state receiverships and has previously served as receiver or as counsel for the receiver in cases filed by the FTC and by the Securities Commissioner for the State of Maryland. In this District Court, Mr. Keith served as receiver in the matter *FTC v. Midway Industries, LLC,* Case No. JKB-14-CV-2312 (D. Md.) and also in *FTC v. Residential Relief Foundation, Inc.*, Case No. JFM-10-CV-3214 (D. Md.). A cover letter with attachments describing Mr. Keith's and his firm's experience is affixed as **Attachment A**. Mr. Keith's letter also expresses his willingness to work on this matter and includes information about the hourly rates Mr. Keith and his anticipated team would charge in connection with this receivership. In addition, Mr. Keith has indicated he is not aware of any conflict that would preclude him from acting as a receiver in this matter. Should the Court desire to consider additional options for appointment as temporary receiver, the FTC can provide names of other highly qualified candidates.

Respectfully submitted,

Alden F. Abbott
General Counsel

Dated: December 7, 2020

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Attorneys for Plaintiff
Federal Trade Commission

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2020, I electronically filed the foregoing with the Clerk of the Court using CM/ECF and provided notice and copies of the foregoing Notice of Candidate for Appointment as Receiver and attachment to each of the defendants specified below via email. I further certify that on December 7, 2020, a copy of the foregoing papers was provided to a process server for hand delivery, along with the Complaint, to each of the defendants below:

RagingBull.com, LLC
Jeffrey M. Bishop
Jason Bond f/k/a Jason P. Kowalik
Kyle W. Dennis
Sherwood Ventures, LLC
Jason Bond, LLC
Winston Research Inc.
Winston Corp.
MFA Holdings Corp.

Colleen Robbins